REMARKS

The office action of April 21, 2009, has been carefully reviewed and these remarks are

responsive thereto. Reconsideration and allowance of the instant application are respectfully

requested.

Claims 17-30 remain in this application. Claims 1-16 and 31-32 have been canceled.

Applicants request reconsideration of the April 21, 2009, office action based on the following

comments.

Objections to the Claims

Claims 18-30 stand objection to as being of improper dependent for failing to further

limit the subject mater of a previous claim.

Applicants strenuously traverse this objection. The Examiner has merely stated that the

dependent claims are improper but has not identified any aspect of the claims or provided any

example of what is improper. As such, Applicants cannot ascertain to what the Examiner is

referring to in this objection.

Accordingly, Applicants request the Examiner to withdraw this objection or identify

specifically the point of the objection.

Rejections under 35 U.S.C. § 112, First Paragraph

Claims 17-30 stand rejected under 35 U.S.C. § 112, first paragraph. Claims 18-30 stand

rejected because they depend from rejected claim 17.

The Examiner rejects claim 17 as reciting "monitoring unit." Claim 17 has been amended

to overcome this rejection. Dependent claims 18-30 have overcome this rejection as being

dependent on amended claim 17.

Rejections under 35 U.S.C. § 112, Second Paragraph

Claims 17-30 stand rejected under 35 U.S.C. § 112, second paragraph. Claims 18-30

stand rejected because they depend from rejected claim 17. Claim 17 has been amended to

overcome the rejection. Dependent claims 18-30 have overcome this rejection as being

dependent on amended claim 17.

Page 5 of 8

Rejection of Claims 17-26 under 35 U.S.C. § 103 over Yaksich and Sevcik

Claims 17-26 stand rejected under 35 U.S.C. 103(a) as being unpatentable over U.S.

Patent No. 7,563,999 to Yaksich et al. in view of U.S. Patent No. 6,330,542 to Sevcik et al.

Applicants respectfully traverse.

As amended, claim 17 recites:

... wherein the database monitoring function detects changes to the

corporate sales management system and, in response thereto,

generates event data comprising information that describes the

sales management event; ...

The Examiner relies on Yaksich to provide this recitation. However, Yaksich fails to

describe any database monitoring function that detects changes in a database. Rather, Yaksich

relates only to generating forms from a common forms library (see column 5, lines 1-61). While

Yaksich describes the printing of the forms in lines 31-41 of column 5, Yaksich fails to teach or

suggest any computer as recited in claim 17 that monitors events in a database. Rather, Yaksich

pertains to the creation of business forms by users using remote PCs and the subsequent

distribution of the forms via remote printing. See column 5, lines 1-5. In short, Yaksich describes

how a user <u>overtly</u> controls the "forms automation platform" (FAP 14) to generate forms from

parts of forms stored in the "central library facility" (CLF 12). As such there is no need to

monitor any events in Yaksich because the user is controlling the forms creation and subsequent

printing at remote locations.

Accordingly, Yaksich fails to teach or suggest what the Examiner asserts Yaksich teaches

(namely, Yaksich fails to teach or suggest the monitoring of a database for events as recited in

claim 17).

Next, claim 17 recites:

a print processing facility, ... wherein the print processing

facility receives the event data, compares the event data to one or

more predefined event rules that determine that the printed product

Page 6 of 8

should be produced or should not be produced and, in response to a

determination that the printed product should be produced,

automatically generates a print order for the printed product using

information extracted from the event data.

The Examiner relies on Sevcik to provide this recitation. However, Sevcik fails to teach

or suggest any print processing facility that 1) "compares the event data" then 2) "automatically

generates a print order" as recited in claim 17. In fact, Sevcik is directed to providing price

quotes to a user as acknowledged by the Examiner. While the Examiner asserts that the

determination whether to print is analogous to the user deciding whether to accept a print quote,

there is no set of rules in Sevcik that are applied to make this determination. In fact, Sevcik is

silent on how any user decides whether to accept a print job.

Further, ignoring the fact that Sevcik lacks a defined set of rules employed to determine

whether a print order is to be generated, Sevcik forces the user to be involved in every step of the

selecting options process to generate a print quote. Sevcik fails to teach or suggest any

monitoring of a database for events to which predefined event rules may be applied.

Thus, the combination of Yaksich and Sevcik fails to teach or suggest claim 17.

Claims 18-26 depend from claim 17, and are allowable for at least the same reasons as

claim 17 and in further view of the advantageous features recited therein.

Rejection of Claims 27-30 under 35 U.S.C. § 103 over Yaksich, Sevcik, and IPrint.com

Claims 27-30 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Yaksich

in view of Sevcik and further in view of IPrint.com. Applicants respectfully traverse.

IPrint.com fails to teach or suggest the recitations missing from the combination above.

Accordingly, dependent claims 27-30 are allowable.

Page 7 of 8

Application No.: 09/479,918 Amendment dated October 21, 2009 Reply to Office Action of April 21, 2009

The Commissioner is authorized to debit or credit our Deposit Account No. 19-0733, accordingly.

All rejections having been addressed, applicants respectfully submit that the instant application is in condition for allowance, and respectfully solicit prompt notification of the same.

Respectfully submitted, BANNER & WITCOFF, LTD.

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Dated: October 21, 2009

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